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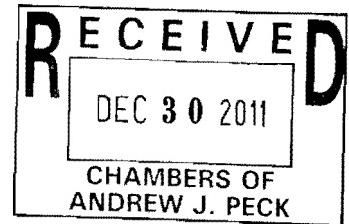
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December 30, 2011

**VIA FACSIMILE**

Honorable Andrew J. Peck  
 U.S.D.C. – Southern District of New York  
 Daniel Patrick Moynihan United States Courthouse  
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**Re: da Silva Moore, et al. v. Publicis Groupe SA, et al., Civ. No. 11-CV-1279**

Dear Judge Peck,

Plaintiffs write to respectfully request that Plaintiffs' ESI experts from DOAR Litigation Consulting be permitted to attend the upcoming ESI conference scheduled for January 4, 2012. Plaintiffs require the assistance of their ESI experts to address technical issues concerning their proposed ESI protocol that may arise at the conference, including Plaintiffs' proposed search methodology using the predictive coding approach. We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Janette Wipper

Janette Wipper

Cc: All counsel of record

*Approved.*  
 SO ORDERED  
 Hon. Andrew Jay Peck  
 United States Magistrate Judge